

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

50 TICE BOULEVARD, SUITE 380
WOODCLIFF LAKE
NEW JERSEY 07677
TELEPHONE (201) 391-3737
FACSIMILE (201) 391-9360
www.pricencese.com

GREGORY D. MEESE*

GAIL L. PRICE*+

FREDERIC M. SHULMAN*+

LOUIS L. D'ARMINIO* △

JOHN R. EDWARDS, JR.*

MICHAEL K. BREEN*

PAUL A. CONCIATORI*#

WILLIAM D. BIERMAN*

CATHY J. POLLAK*

THOMAS C. MARTIN •

JOHN L. MOLINELLI*x

RICHARD M. FRICKE*+

MARKW. GREENE*△

KAREN F. EDLER *

MICHAELA, OROZCO**

RICK A. STEINBERC*△

DOROTHY A: KOWAL

JENNIFER M. KNARICH**

GREGORY K. ASADURIAN

RENEE A FATOVIC*

ALLYSON KASETTA*

JENNIFER M. BERARDO*

JACQUELINE E, SHULMAN*

NATALIE N. DIRATSOUIAN* MICHELLE L. KRONE

- * Also admitted in NY
- + Also admitted in DC
- △ Also admitted in PA
- ♦ Also admitted in CT
- Also admitted NY Fed Cts.

Also LEED AP

x Bergen County Prosecutor (ret.)

Additional Offices: + WEST RED OAK LANE, SUITE 302 WHITE PLAINS. NEW YORK 1060+ TELEPHONE (91+) 251-1618 FACSIMILE (91+) 251-1230

ONE GATEWAY CENTER, SUITE 2600 NEWARK, NEW JERSEY 07102 TELEPHONE (973) 799-8551 FACSIMILE (973) 735-2719 March 13, 2019

Via ECF Only

New Jersey Federal District Court

Attn: Honorable William Walls

50 Walnut Street

Newark, NJ 07102

Re:

USA v. Daniel Dxrams

Crim No.: 18-379 (WHW)

Dear Judge Walls:

Please accept this letter on behalf of our client, Daniel Dxrams, with regard to our request to adjourn the April trial until June 10, 2019. I have conferred with codefendant's stand by counsel, Mr. Kayser, who consulted with his client and joins in my request. The government has agreed to the two month adjournment.

The government has been diligent in providing digital copies of discovery by way of CD or hard drives provided by my office, in addition to permitting access and inspections of discovery at both their offices and the FBI headquarters in Newark. It is the defendants' position that the discovery is voluminous and requires more time in order to prepare for trial.

The parties are requesting a case management conference at Your Honor's convenience in order to address the defendants' request and set new dates and deadlines. Thank you in advance for your consideration of this request.

Sincerely

Michael Orozco

MAO/mao

cc:

All Counsel (Via ECF)

